

# Air Pollution Control Division

## Canton City Health Department

420 Market Avenue North • Canton, Ohio • 44702-1544  
(330) 489-3385 • Fax: (330) 489-3335

Robert E. Pattison, MPA  
Health Commissioner

Daniel J. Aleman  
APCD Acting Administrator

### CERTIFIED MAIL

Mr. Vinod K. Gupta  
Ohio Cast Products  
2408 - 13th Street NE  
Canton, OH 44705

**Subject: OHIO ADMINISTRATIVE CODE ("OAC") VIOLATIONS CONCERNING  
CONTROL DEVICES SERVING EMISSIONS UNITS P901, F003 & COOLING LINE**

Dear Mr. Gupta:

On October 3, 1997, members of this Agency conducted a source-specific inspection at Ohio Cast Products ("OCP"). This inspection was based on citizens' complaints this Agency received, which indicated that large, black, particulate matter was being emitted from OCP and deposited on neighboring properties adjacent to OCP. The materials being emitted were determined to be mold sand.

The inspection effort focused on the operation and applicable records of a wet scrubber and a newly installed baghouse. These two (2) control devices are required to control emissions of such materials from the sand handling system (Emissions Unit F003) and the recently installed Didion sand shakeout unit (Emissions Unit P901). At the time of this inspection, this Agency's permitting records showed the emissions from the Didion sand shakeout (P901) to be controlled by the newly installed baghouse and the emissions from the sand handling system (F003) controlled by a wet scrubber. During an Agency meeting with OCP on November 3, 1997, it was disclosed by OCP that emissions from the cooling line and partial emissions from the sand handling system (F003) of major amounts were routed for control by the newly installed baghouse serving Emissions Unit P901.

Overall, the inspection disclosed several areas of concern. The remainder of this letter will discuss those disclosures, notify you of the associated violation determinations they represented and ask for your full cooperation in rectifying the noted, unacceptable conditions in an expedient manner.

### Baghouse Unit Serving Emissions Units P901, F003 & Cooling Line

**Finding #1:** With the Didion sand shakeout in operation, the associated baghouse (control device) was inspected. No visible emissions ("VE's") were observed coming from the baghouse emission stack. However, large, black, particulate matter was physically felt as a fallout in the immediate area around the stack, especially downwind of the unit. Accumulated deposits were observed and photographed on white paper downwind of this baghouse.

*Lisa Holscher*  
USEPA  
3V  
**OhioEPA**  
APC Contractual Representative  
Serving All of Stark County

RECEIVED

DEC 01 1997

AIR ENFORCEMENT BRANCH  
U.S. EPA, REG. 5

November 21, 1997

Facility : Ohio Cast Products

Premise No.: 15 76 05 0200

This Agency was first informed of the recent emission problem at OCP via a citizen's complaint on August 11, 1997. From that time period until the writing of this letter, eleven (11) such complaints have been received (i.e. 8/11, 8/25, 9/18, 9/22 [2], 9/29 [2], 10/1, 11/3 & 11/18 [2]) by this Agency. An OCP memo issued September 22, 1997 to this Agency stated that an OCP visual inspection on September 18, 1997 showed no visible leaks in the P901 baghouse unit. At the time of the October 3, 1997 inspection, this Agency was informed by OCP personnel that the P901 baghouse contained fifty (50) fabric filter bags that were in poor condition, based on a black light test conducted on September 22, 1997 by the Mike Volk Company. At that time, OCP had only two (2) replacement bags on hand; and, therefore, OCP had to order and receive additional bags before an attempt could be made to rectify this problem. The replacement bags ordered were not received by OCP until October 4, 1997, at which time, they were installed during the third shift.

According to OCP production records, OCP worked all but twelve (12) days from August 11, 1997 up to the end of September, 1997. As of the writing of this letter, this Agency has not received any correspondence from OCP regarding the malfunction of the baghouse control device for the P901 unit. In fact, it was this Agency's phone call to OCP on September 19, 1997 regarding citizens' complaints that prompted information (letter of September 21, 1997) from OCP. Before the October 3, 1997 inspection, this Agency only knew that OCP was looking for a cause as to their emission problem. Prior to the inspection, this Agency did not know that a malfunction had been found by OCP.

**Violation of: OAC 3745-15-06 (B) (1) -- Ohio EPA or its delegated representative must be informed: 1) of any breakdown of equipment in which the resulting emissions constitute a violation of any applicable law, 2) in writing (as to any malfunction of air pollution control equipment) within two (2) weeks of a malfunction which exceeds a 72-hour period\* and 3) in writing concerning the correction of any malfunction condition which requires a written malfunction report. (A verbal correction notification is required for those malfunctions not exceeding a 72-hour period.) OCP's failure to follow the proper protocol constitutes a violation of OAC 3745-15-06 (B) (1).**

**\* Both a verbal notification and a written report must prescribe to specific information as outlined in the referenced regulation.**

**Action #1: *This Agency requests that OCP submit a proper and complete, written notification of malfunction to this Agency within ten (10) days of receipt of this letter. That written notification needs to specifically, completely respond to OAC 3745-15-06 (B) (1) (a) (b) (c) & (d).***

**Action #2: *In addition, it should be noted here that, as a result of a previous meeting between OCP personnel and the Canton APCD Agency on November 17, 1995, a Preventive Maintenance Plan was submitted to this Agency on December 22, 1995. That plan was for the three fabric filters and the two scrubbers that were at OCP at that time period.***

*However, this recent incident indicates that either that plan is no longer in effect or the plan has not been upgraded to include control devices installed since that time period. Therefore, this Agency requests that a specific Preventive Maintenance and Malfunction Abatement Plan ("PMMAP") be established and submitted to this Agency within thirty (30) days of receipt of this letter for the P901 baghouse. That PMMAP must be established in accordance with OAC 3745-15-06 (D) (1) (a) (b) & (c).*

**Action #3:** *Since this malfunction has been documented as being over 72 hours in duration, this Agency requests that OCP inform this Agency in writing as to when the baghouse for the P901 emission unit is properly repaired and functional. Such a written notification is to be done in accordance with OAC 3745-15-06 (B) (2) and must be submitted to this Agency prior to the December 5, 1997 stack test date (as established in the certified Notice of Violation letter issued by this Agency to OCP on October 21, 1997).*

**Finding #2:** Agency investigations regarding recent citizens' complaints against OCP have shown that mold sand emissions from OCP's P901 baghouse malfunction have been deposited onto neighboring properties and have been the cause of soiling to private vehicles, homes and other personal property not located at OCP. Photographs and samples of emission deposits have been collected for documentation.

**Violation of:** **OAC 3745-15-07 (A) – The emission or escape into the open air from any source or sources whatsoever, of smoke, ashes, dust, grime, ..., or any other substance or combinations of substances, in such a manner or in such amounts as to endanger the health, safety or welfare of the public, or cause unreasonable injury or damage to property, is found and declared to be a public nuisance. It is unlawful for any person to cause, permit or maintain any such public nuisance. Malfunctions that cause actual or potential damage (or endangerment) to health or property would be a violation of OAC 3745-15-07. Based on evidence collected and observed, the malfunction of the P901 baghouse at OCP constitutes a violation of OAC 3745-15-07 (A) regarding an air pollution nuisance.**

**Action #4:** *OCP needs to take immediate action to correct the problem they are experiencing with their P901 baghouse unit, and such corrective measures need to be implemented for a long fix of the baghouse malfunction. OCP is requested to submit to this Agency within thirty (30) days of receipt of this letter an acceptable, detailed compliance plan that addresses a long term correction to the problems of this baghouse malfunction.*

### **Wet Scrubber Unit Serving Emissions Unit F003**

**Finding #3:** The sand handling system (F003) utilizes (for the most part) a wet scrubber as the main control device. Because this wet scrubber was utilized in the past to also control emissions collected from an electric induction furnace ("EIF"), the operating parameters for this wet scrubber are found as part of the T&C's of the EIF PTO (Emissions Unit P011, T&C #3). Even though emissions from the EIF are now directed to a separate baghouse, the operating parameters for the wet scrubber have never been changed. One such operating

parameter is that the wet scrubber is to be operated at not less than 350 gallons per minute (gpm) water volume. Additionally, the recording of the actual wet scrubber operating parameter readings are to be recorded by OCP personnel every four (4) hours of operation and at a minimum, every time the scrubber is operated.

On May 3, 1996, a stack test on this wet scrubber was conducted to show compliance with particulate emission allowables. At the time of the May 3rd testing, the wet scrubber was being utilized to control emissions from OCP's Emissions Units F003 & P003 (Hunter Shakeout), and the scrubber was operated at a water volume flow of 360 to 365 gpm. The May 3, 1996 test showed the scrubber in compliance at that time. The inspection on October 3, 1997 disclosed that OCP is now utilizing a minimum water volume of 300 gallons per minute (per OCP's record forms and actual recordings), and such parameter readings are being conducted only once every eight (8) hour shift. Therefore, OCP is not complying with permit T&C's regarding the proper operation of this wet scrubber.

**Violation of:** OAC 3745-35-02 (D) (6) -- Not complying with a PTO T&C would constitute a violation by OCP of OAC 3745-35-02 (D) (6) regarding the Director's authority to include terms and conditions as are necessary to ensure compliance with applicable air pollution control law.

**Action #5:** *This Agency requests that OCP comply immediately with the T&C #3 for P011, regarding the operating parameters for the sand handling system (F003) wet scrubber or retest this unit within thirty (30) days of receipt of this letter to demonstrate its compliance with particulate emission allowables while operating at a minimum 300 gpm water flow rate. Actual operating parameters for the wet scrubber are to be recorded every four (4) hours of operation and at least every time it is operated.*

### **F003 & P901 Record Keeping**

**Finding #4:** The October 3, 1997 inspection included a review of OCP control equipment operating parameter records and production data with respect to the F003 & P901 emission units. During that review, it was noted that records completed by two (2) OCP personnel had a consistent pattern to their readings. Knowing that such control equipment's operating parameters vary within a specified range from day to day and even hour to hour (in some cases), this Agency strongly suspects that the readings recorded as part of OCP's record keeping data is inaccurate and may possibly be considered fraudulent. In addition to this, production records show deficiencies in some daily information which would result in inaccurate summations and interpretations.

Ohio EPA, Air Pollution Control Law found under the Ohio Revised Code §3704.05 (H) prohibits: 1) the falsifying of any plans, specifications, data, reports, records, or other information required to be kept or submitted to the director by this chapter or rules adopted under it, 2) making any false material statement, representation, or certification in any form, notice, or report required by the Title V permit program and 3) rendering inaccurate any monitoring device required by a Title V

**permit. Honest mistakes are not considered falsification. However, intentionally recording data that is inaccurate may be considered falsification and constitute a violation of the ORC 3704.05 (H).**

**Action #6:** *This Agency requests that OCP management reviews its production records for the last one-year period and rectifies those areas found deficient of information. OCP management also needs to confirm that all OCP personnel responsible for recording control equipment operating parameter readings are doing so properly and accurately. OCP management may need to employ a training and an audit plan in follow-up to the observed work practices of some OCP personnel. This should be completed within fourteen (14) days of receipt of this letter.*

**Requested Action and Compliance Milestone:**

**Completion Date:**

- |  |   |
|--|---|
| 1. Submit a proper and complete, written notification to this Agency regarding the malfunction of the P901 baghouse system in accordance with OAC 3745-15-06 (B) (1) (a) (b) (c) & (d) by  | December 1, 1997                                |
| 2. Submit a specific PMMAP for the P901 baghouse system in accordance with OAC 3745-15-06 (D) (1) (a) (b) & (c) by   | December 19, 1997                               |
| 3. Submit a proper and complete, written notice of repair for the P901 baghouse malfunction in accordance with OAC 3745-15-06 (B) (2) prior to   | December 5, 1997                                |
| 4. Submit an acceptable, detailed, long term compliance plan regarding the P901 baghouse system operation by   | December 19, 1997                               |
| 5. Meet the four hours of operation parameter recording requirement for the F003 wet scrubber as required by P011 PTO T&C #3 and then either the 350 gpm operating parameter requirement upon<br><u>OR</u><br>Retest the wet scrubber at a minimum water flow rate of 300 gpm by | Receipt of this letter<br><br>December 19, 1997 |
| 6. Review production records for deficiencies and train / audit OCP recording personnel for work practices by  | December 3, 1997                                |

Please note that the submission of a malfunction and correction report and a PMMAP do not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the ORC 3704.06. The determination to pursue or to decline to pursue such penalties in this matter will be made at a later date.

Mr. Vinod K. Gupta  
Ohio Cast Products  
November 21, 1997  
Page 6

In accordance with Canton City Health Code 209.05, any person who is aggrieved by an order directing or requiring any action, forbearance or compliance may, prior to taking an appeal to the Canton Board of Health, request and receive a prompt hearing before the Canton City Health Commissioner or any representative specifically designated by him, provided that such request for administrative hearing is made in writing within five days from receipt of such order. Any person who is aggrieved by an order directing or requiring any action, forbearance or compliance from him may appeal to the Canton Board of Health in accordance with the procedures prescribed by the Board.

Should you have any questions regarding this matter, please contact this Agency at (330) 489-3385.

Sincerely,



Daniel J. Aleman  
APCD Acting Administrator

Enclosures: 1) OAC 3745-15-06  
2) OAC 3745-15-07  
3) OAC 3745-35-02  
4) ORC §3704.05

pc: Lisa Holscher, USEPA - Region V  
Catherine Collins, USEPA - Region V  
Tom Kalman, Ohio EPA, DAPC - CO  
Vaughn Laughlin, Ohio EPA, Director's Office  
William H. Haak, Ohio AGO

H:\MILLER\APC\DOCS\UNSPEC\RM1104VG.WPD